

NOTES

Tuesday March 25<sup>th</sup>

\*Claudette called to say her 2<sup>nd</sup> period Spanish I students were not following directives and she was sending a student to the office. I asked if she wanted me to come up to her classroom and she said, "Yes". When I arrived Claudette was arguing with a student regarding a worksheet. Claudette said that she had given the entire class a worksheet. He said he did not have one. She finally gave him a worksheet. She then sees that another student does not have a worksheet and asks the young lady where her worksheet was? The young lady tells Claudette that she never received one. Claudette again says that she gave everyone a worksheet and continues to ask the student where her worksheet was. The student starts to get irate with Claudette so she is finally given a worksheet. As Claudette moves to the front of the classroom a third student has her hand raised. When called upon this student says she does not have a worksheet. Without further argument Claudette gives this student a worksheet. Two students from this class were written up and sent to the office before my arrival. (See Misconduct Records)

Wednesday March 26<sup>th</sup>

\*Adam Albaugh stopped in to see me 1st period. He informed me that Claudette had lost his notebook. His mother called me at 11:40 to voice her concern in regard to Claudette losing her son's classwork.

\*Claudette forgot she was having surgery today. My secretary informed me that Claudette was trying to get in touch with the sub service to secure a substitute for the day. I was able to locate a substitute for Claudette.

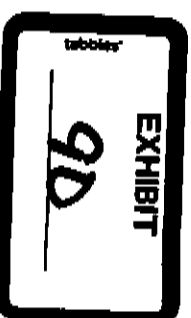
Thursday March 27<sup>th</sup>

\*Claudette stopped in 7<sup>th</sup> period to inform me Missy Cobb had threatened her. She allegedly said to Claudette, "My mom can beat you up, my aunt can beat you up, and my grandmother can beat you up. My whole family can beat you up". Claudette said to me that she felt threatened and didn't want to get beat up.

When Mr. Deshner and myself questioned Missy Cobb she denied saying her family was going to beat up Claudette. She said that when Claudette had asked her about a phone call she had made home she had responded that her mom wanted to MRET her. After further investigation into this it was discovered that Missy was not being truthful with us. Missy was subsequently suspended for 3 days for making inappropriate comments to a staff member. I would like to note that Missy had complained to me on Tuesday that Claudette had lost her notebook.

Tuesday April 1<sup>st</sup>

\*Nicole Dawson stopped in at 10:12 to inform me Claudette had lost her worksheets that she handed in yesterday (Monday March 31<sup>st</sup>). Student was very upset.



Said Claudette had told her she had not collected any homework. Claudette had given this student a pass to come see me during class time. I informed Nicole that I would speak to Claudette.

\*Samantha McNicholas stopped in at 10:20 to inform me Claudette had lost her worksheets. Again Claudette had given this student a pass to come see me during class time. Samantha informed me that she had turned the work in and Claudette was telling her she never received any work from Samantha. I informed Samantha that I would speak with Claudette.

\*Mr. Apel (Guidance Counselor) called at 12:15. He said one of Claudette's students was in his office. He informed me the student (Heather Longstrech) was upset, because she felt Claudette was losing her homework and not giving equal credit for the same assignment.

\*Cheryl Albaugh called at 1:45 to see if I found out anything in regard to Adam's notebook. I informed her I had spoken to Claudette about the notebook and that Claudette had said she never received a notebook from Adam.

\*Claudette stopped in to see me near the end of 7<sup>th</sup> period. She informed me that she never collected the work that Samantha and Nicole were talking about. She said Nicole always does her work and the work was probably in Nicole's own binder. I believe Claudette was insinuating that the student had only thought she handed it in and instead had put the work in her Spanish binder by mistake. Claudette continued by stating that Samantha is not a reliable student and never does any work. She felt Samantha was lying about doing the worksheets.

**Wednesday April 2<sup>nd</sup>**

\*Claudette stopped in at 7:40 am to inform me that she had located Samantha and Nicole's missing assignments in another class folder. Apparently Claudette had collected the worksheets, but put them in the wrong folder.

**Tuesday April 8<sup>th</sup>**

\*Samantha McNicholas was allowed to come to my office at 9:53 during her 3<sup>rd</sup> period Spanish II class. The reason was to speak to me about a detention that Claudette had given her for talking in class. Samantha was upset, because she felt Claudette was being unfair to her. She said Claudette had not informed her she was getting a detention for talking and that Claudette has lost her assignment's before and denied losing them. She feels that the administration is not getting a clear picture of what's happening in the classroom, because when we observe her she tries to act like a real teacher. She wanted to know why we couldn't put cameras in the classroom. I informed her that I could not overturn a teacher detention and to make sure to account for all assignments in the future.

## NOTES

Friday August 30th

\*Claudette sent Ryan Jack to auditorium study hall, because she said he wasn't following her rules of no talking. He said she wanted him out of her study hall. He said he was talking, but so were other people. I spoke with Ryan and explained that he needed to follow her rules.

\*Dallas received detention from Claudette for FFD/Not being seated. Said he never got a warning.

Friday September 13th

\*Mrs. deLeon called Mr. Apel 3rd period requesting that Nicole Dawson be removed from her class. Student refuses to cooperate or do anything. Said she would call parent and suggest she drop class. Mr. Apel advised her not to since it was a course she requested and received a "B" in last year. Mr. Apel said he would speak with Nicole.

Friday September 20th

\*4th period, at 10:31 today I was in C-Wing. I noticed there was no teacher in Mrs. deLeon's class. She did not arrive until 10:35 (4 min. late). She informed me that she was speaking to Meg Daniels about a student.

Monday December 9th

\*8th period 2:50 p.m. Tried calling Claudette, but there was no answer. I went to her classroom and a student (Chris Fisher) was sitting outside her classroom. He said he was kicked out for talking. When I stepped into the room Claudette was teaching and did not acknowledge me for 25-30 seconds. I asked her to call me when she got a chance. I turned on the ring before I left so she could receive phone calls.

Monday December 16th

\*Meeting with Mrs. Wisinski/Mrs. deLeon - Claudette admitted that she put Evan's name on the board. "I want to give Evan a detention" she then had the class translate to Spanish.

\*Mrs. Glogone called regarding Claudette and the detention she gave her daughter. Said daughter has had problems with Claudette all year.

Tuesday December 17th

\*7:35 a.m. Claudette stopped by my office to talk about the meeting with Mrs. Wisinski. I suggested putting assignments for the 6-week period on the computer so she would have a better idea of what the student was missing.

Wednesday January 15th

\*Nick Grindstaff and Amber Lenhart sent to office by Claudette to speak to me about not putting their heads on desk.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT  
OF PENNSYLVANIA

\* \* \* \* \*

CLAUDETTE DELEON, \*

Plaintiff \*

vs. \*

CRAWFORD CENTRAL \*

SCHOOL DISTRICT, \*

CRAWFORD CENTRAL \* Case No.

SCHOOL BORAD, \* 05-126E

MICHAEL E. DOLECKI \*

SUPERINTENDENT, \*

CHARLES E. HELLER, \*

III, ASSISTANT \*

SUPERINTENDENT, \*

Defendants \*

\* \* \* \* \*

COPY

DEPOSITION OF

DEBORAH ENGLEBAUGH

APRIL 24, 2006

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by the certifying agency.



Page 2	Page 4
<p>1 DEPOSITION</p> <p>2 OF</p> <p>3 <input checked="" type="checkbox"/> <del>DEBORAH</del> ENGINEERAGE, taken on behalf</p> <p>4 <input checked="" type="checkbox"/> the Plaintiff herein, pursuant to</p> <p>5 <input checked="" type="checkbox"/> Rules of Civil Procedure, taken</p> <p>6 before me, the undersigned, Judge</p> <p>7 <del>McClarty</del>, a Court Reporter and Notary</p> <p>8 public in and for the Commonwealth of</p> <p>9 Pennsylvania, at the Days Inn, 18360</p> <p>10 <del>C</del> Ocean Lake Road, Meadville,</p> <p>11 Pennsylvania, on Monday, April 24,</p> <p>12 2:00, beginning at 10:18 a.m.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2</p> <p>3 WITNESS: DEBORAH ENGINEERAGE</p> <p>4 EXAMINATION 7 - 33</p> <p>5 by Attorney Nichols</p> <p>6 EXAMINATION 34 - 67</p> <p>7 by Attorney Heath</p> <p>8 RE-EXAMINATION 68 - 71</p> <p>9 by Attorney Nichols</p> <p>10 RE-EXAMINATION 71 - 73</p> <p>11 by Attorney Heath</p> <p>12 CERTIFICATE 74</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 3	Page 5
<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 CALEB NICHOLS, ESQUIRE</p> <p>4 P.O. Box 1585</p> <p>5 Erie, PA 16507</p> <p>6 COUNSEL FOR PLAINTIFF</p> <p>7</p> <p>8 ROBERTA BEATH, ESQUIRE</p> <p>9 Andrews &amp; Beard</p> <p>10 3366 Lywood Drive</p> <p>11 P.O. Box 1311</p> <p>12 Altoona, PA 16603</p> <p>13 COUNSEL FOR DEFENDANT</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 EXHIBIT PAGE</p> <p>2</p> <p>3 PAGE</p> <p>4 NUMBER DESCRIPTION IDENTIFIED</p> <p>5 One Subpoena 7</p> <p>6 Two 1/4/91 Grievance 22</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Page 6	Page 8
<p>1 OBJECTION PAGE</p> <p>2</p> <p>3 ATTORNEY PAGE</p> <p>4 Heath 70</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 QMs. Englebaugh, would you for</p> <p>2 the record state your professional</p> <p>3 background if you will, please</p> <p>4 commencing with your education,</p> <p>5 college education, bringing us</p> <p>6 current, please?</p> <p>7 A.Okay. I have a Bachelor of</p> <p>8 Fine Arts Degree from Penn State</p> <p>9 University. I also have a Master of</p> <p>10 Arts from Edinboro University and I</p> <p>11 also received my certification in art</p> <p>12 education from Edinboro. I taught</p> <p>13 three years in Meadville at Seton</p> <p>14 School and then approximately seven</p> <p>15 years at Crawford Central School</p> <p>16 District.</p> <p>17 I'm a published author. I</p> <p>18 wrote three art education books that</p> <p>19 were published by a company in</p> <p>20 Colorado. I'm in their book survey</p> <p>21 nationally and within the United</p> <p>22 States. I'm continuing to take</p> <p>23 college credits at Slippery Rock</p> <p>24 University currently. I am not</p> <p>25 employed. I'm the mother of two boys</p>
Page 7	Page 9
<p>1 P R O C E E D I N G S</p> <p>2 -----</p> <p>3 DEBORAH ENGLEBAUGH, HAVING FIRST BEEN</p> <p>4 DULY SWORN, TESTIFIED AS FOLLOWS:</p> <p>5 -----</p> <p>6 EXAMINATION</p> <p>7 BY ATTORNEY NICHOLS:</p> <p>8 Q.Okay. Ms. Englebaugh, Debra</p> <p>9 Englebaugh, I'm Caleb Nichols here</p> <p>10 representing the Plaintiff,</p> <p>11 Claudette, in this proceeding of</p> <p>12 deLeon versus the Crawford Central</p> <p>13 School District and others. First of</p> <p>14 all, I want to thank you for</p> <p>15 appearing this morning and we offer</p> <p>16 our apologies for being late. But I</p> <p>17 want to thank you very much. You</p> <p>18 appear here today pursuant to a</p> <p>19 subpoena that I've issued on behalf</p> <p>20 of the Claimant and I would ask that</p> <p>21 this be marked Plaintiff Exhibit One.</p> <p>22 (Plaintiff Exhibit Number</p> <p>23 One marked for</p> <p>24 identification.)</p> <p>25 BY ATTORNEY NICHOLS:</p>	<p>1 and I live in Hemitage,</p> <p>2 Pennsylvania.</p> <p>3 Q.And when did you commence your</p> <p>4 teaching career?</p> <p>5 A.At what age?</p> <p>6 Q.Or what year?</p> <p>7 A.What year?</p> <p>8 Q.When and where?</p> <p>9 A.I believe it was 1984.</p> <p>10 Q.And then where was this?</p> <p>11 A.That was at Meadville at Seton</p> <p>12 School.</p> <p>13 Q.Okay. And how long did you</p> <p>14 teach there?</p> <p>15 A.I taught there for three</p> <p>16 years.</p> <p>17 Q.And what did you teach?</p> <p>18 A.I taught art and that was</p> <p>19 kindergarten through eighth grade.</p> <p>20 Q.I see.</p> <p>21 A.And that was a part-time</p> <p>22 position.</p> <p>23 Q.I see. And from there where</p> <p>24 did you go?</p> <p>25 A.And then I ---- during my</p>



Page 10	Page 12
<p>1 second year at Seton I started to 2 take classes to become certified, 3 because at that point I only had a 4 Bachelor of Fine Arts degree. But at 5 Seton, because it was a parochial 6 school I did not need a teaching 7 certificate, but decided to go ahead 8 --- because I loved teaching so much 9 I decided to go ahead and get my 10 certification while I was working at 11 Seton. 12 And at that --- I guess it was 13 probably my third year I started to 14 substitute teach at Meadville and 15 Penn Crest School District, which is 16 Saegertown and the areas north of 17 Meadville. And then the fourth year 18 of my teaching I was hired full time 19 at Meadville. 20 Q That was the high school? 21 A At that point I was hired at 22 Cochran Elementary, which is part 23 of the District. Cochran is part 24 of their school district and I taught 25 for three years at Cochran and</p>	<p>1 Q Okay. And you taught there 2 how many years? 3 A Two years. 4 Q So specifically you taught as 5 to the dates, we're talking about 6 what years? 7 A '89 --- I taught the school 8 year '89 to '90, '90 to '91. 9 Q Okay. And what was your 10 experience as a teacher there under 11 Mr. Deshner serving as principal? 12 A It was the most horrifying 13 experience I've ever had in my life. 14 Q Let's be specific if we can. 15 A Specific. 16 Q You called it horrifying? 17 A It was. I can't even think 18 about the experience without getting 19 emotional. So you'll have to excuse 20 me. 21 Q Take your time. 22 A When I took the position as I 23 said, he gave it to me reluctantly, 24 my understanding was that there was 25 no photography studio or classroom</p>
Page 11	Page 13
<p>1 then a job opening became available 2 at Meadville High School in a 3 photography position. And I bid on 4 that position because I had a 5 Master's degree. I was more 6 qualified than anyone else that bid 7 on that position, because of my 8 Master's degree. So they reluctantly 9 gave me the position. 10 Q When did you start to work for 11 the Meadville High School? 12 A That would have been in the 13 fall of 1989. 14 Q And what did you teach there? 15 A I taught photography, a couple 16 of sections of photography and some 17 basic classes, like a craft class and 18 basic drawing. 19 Q And who was the principal at 20 Meadville? 21 A The head principal was George 22 Deshner and the assistant principals 23 were Carol Templeton and Mike Ferala 24 (phonetic). I think that's how you 25 pronounce his name, Ferala.</p>	<p>1 before 1989. His friend that was at 2 the junior high helped him to 3 establish a photography studio to, 4 you know, write up the name of the 5 course and to put in the dark room. 6 And I think they figured as long as 7 this gentleman was doing this he 8 would automatically receive the 9 position. 10 But because we had a contract 11 and there were certain rules that 12 they had to follow, they had to open 13 the position up for bidding. And I 14 bid on the position, because I was 15 qualified. I had photography 16 experience from Penn State and I also 17 had the Master's degree, so they had 18 no choice but to give me the 19 position. 20 And I remember when Jim 21 LaScala called me and said that it 22 was my position. He did so in very 23 rude tone. He was like, it's yours 24 if you want it kind of attitude. 25 Q What was Mr. LaScala's</p>

Page 14	Page 16
<p>1 Position?</p> <p>2 A I believe at that point he was</p> <p>3 the assistant superintendent. So you</p> <p>4 know, I wanted the job because I</p> <p>5 wanted --- to me high school was the</p> <p>6 premier position for an art teacher.</p> <p>7 And also I was pregnant and we were</p> <p>8 going to have a baby that summer and</p> <p>9 I wanted to be closer to home which</p> <p>10 was, you know, three or four miles</p> <p>11 from the high school. Cochranon</p> <p>12 was, you know, a 20-minute drive from</p> <p>13 my home.</p> <p>14 Q What was the method of</p> <p>15 evaluation for the position that</p> <p>16 those who apply as candidates ---?</p> <p>17 A Those who applied ---</p> <p>18 Q How were they screened?</p> <p>19 A --- first --- well, the</p> <p>20 criteria was qualifications, the</p> <p>21 contract stated that it was based on</p> <p>22 qualifications. And because Mr.</p> <p>23 Gettys, who was the art teacher that</p> <p>24 Mr. LaScala wanted to give the</p> <p>25 position to, did not have his</p>	<p>1 there's an opening, they post it.</p> <p>2 There's so many days you have to</p> <p>3 apply for that position and I applied</p> <p>4 within the time frame, you know ---.</p> <p>5 Q How did you know his friend</p> <p>6 applied for the position?</p> <p>7 A I got a lot of comments from</p> <p>8 people saying that Mr. Gettys</p> <p>9 designed the class, Mr. Gettys laid</p> <p>10 out the darkroom, it should be Mr.</p> <p>11 Gettys' job. Other art teachers that</p> <p>12 were in the district.</p> <p>13 Q This was after you had gotten</p> <p>14 the job?</p> <p>15 A Before and after. Before and</p> <p>16 after. Yes. People --- other art</p> <p>17 teachers trying to talk me out of it</p> <p>18 because, you know, they were friends</p> <p>19 with Mr. Gettys. But I was</p> <p>20 qualified. I had ---.</p> <p>21 Q All right. Tell us, you</p> <p>22 called this a horrifying experience?</p> <p>23 A Yes.</p> <p>24 Q Be particular about it. Be</p> <p>25 specific. Why was it horrifying?</p>
Page 15	Page 17
<p>1 Master's, he did not have higher</p> <p>2 qualifications than I.</p> <p>3 Q How was it --- tell us, how</p> <p>4 was the screening done? In terms,</p> <p>5 where there was an interview</p> <p>6 committee?</p> <p>7 A I think it was just --- no,</p> <p>8 no, no. For that position basically</p> <p>9 I believe you just sent them a</p> <p>10 request saying that this --- the</p> <p>11 posting --- referring to the posting</p> <p>12 of the job and that, you know, I was</p> <p>13 interested in the position and they</p> <p>14 --- I believe I may have sent them my</p> <p>15 qualifications. But I'm sure they</p> <p>16 had those on record because, you</p> <p>17 know, any classes or anything I had</p> <p>18 to take, they were aware of my</p> <p>19 qualifications. But I believe I</p> <p>20 probably sent them an updated version</p> <p>21 of mine.</p> <p>22 Q They didn't call you?</p> <p>23 A No. No. There was no</p> <p>24 interview process because of the</p> <p>25 bidding system, you know. When</p>	<p>1 A Well, he made it very clear</p> <p>2 from the beginning that he wanted ---</p> <p>3 That he wanted Mr. Gettys in the</p> <p>4 position and not myself.</p> <p>5 Q When you say he, you're</p> <p>6 referring to?</p> <p>7 A George Deshner.</p> <p>8 Q Okay.</p> <p>9 A And --- did not let me help in</p> <p>10 any of the ordering the supplies or</p> <p>11 anything concerning the actual class,</p> <p>12 I was not permitted to help out. And</p> <p>13 all I did was go in and teach. Mr.</p> <p>14 Gettys had control over everything,</p> <p>15 because even though I got the job</p> <p>16 somehow he managed to let Mr. Gettys</p> <p>17 come up there half time.</p> <p>18 He ended up being --- I had to</p> <p>19 share the room with him. Somehow</p> <p>20 there was a job for him there. Even</p> <p>21 though I bid on this position and got</p> <p>22 it, I ended up having to share my</p> <p>23 classroom with him. And I wasn't the</p> <p>24 only photography teacher, he taught</p> <p>25 some of the classes.</p>

<p>Page 18</p> <p>1 Q Did Mr. Desher, your 2 Principal of the school, treat you 3 less favorably than your professional 4 colleagues, to other teachers. 5 A Oh, definitely. Without a 6 doubt. 7 Q How so? 8 A He just treated me rudely. He 9 was very short with me. There was 10 even one incident where he screamed 11 at the top of his lungs in the 12 hallway during the class change and I 13 went running to my room in tears. 14 Q Was it in the presence of your 15 colleagues, your students? 16 A I would --- it was in the 17 presence of everyone that was in the 18 hallway during class change and we 19 were in the main corridor where four 20 halls come together. So I imagine 21 there were some of my colleagues 22 there, there were a lot of my 23 students, but by the end of the day 24 everyone knew what had happened, you 25 know, because it was the talk of the</p>	<p>Page 20</p> <p>1 Q So it's fair to say that he 2 favored Mr. Gettys and he disfavored 3 you? 4 A Definitely. Definitely. 5 Q Do you think that was because 6 of your gender? 7 A No. I think that he 8 definitely disliked me because I was 9 a woman and I knew what I was doing. 10 I was a successful woman, and I think 11 I intimidated him because I was good 12 at what I did and I was a woman. I 13 think --- those things stick out of 14 my mind more than anything. 15 Q Now, you taught there two 16 years you say? 17 A Yes. 18 Q During the course of your 19 teaching there two years, did you 20 have an opportunity to discuss these 21 matters with your colleagues? 22 A You know, he treated me so 23 badly that I was being watched 24 constantly by he and his other 25 principals that I was afraid to talk</p>
<p>Page 19</p> <p>1 school that day --- 2 Q Do you recall specifically the 3 nature of the remarks that he 4 directed at you on that occasion? 5 A I can't remember the specific 6 things that he said because it was 7 quite some time ago. I do remember 8 him turning bright red and screaming 9 at me. It had something to do with 10 the fact that how he was, you know, 11 favoring Mr. Gettys and treating me 12 so badly. 13 Q Well, is it fair to say that 14 they were derogatory remarks as best 15 as you can recall? 16 A Prior to him screaming, you 17 know, he said that I didn't have the 18 qualifications or something like 19 that, you know, those kind of remarks 20 that he goes to Mr. Gettys for 21 information concerning the 22 photography department or room, 23 because, you know, Mr. Gettys was the 24 one that was qualified. Something to 25 that extent.</p>	<p>Page 21</p> <p>1 to a lot of the staff. There were a 2 few people that I did talk with, 3 Claudette was one. There were a 4 couple of others that, you know, knew 5 --- mostly the union representatives 6 I guess. They came to my assistance 7 and helped me out. 8 But you know, I was afraid to, 9 you know, talk to too many people 10 because I felt like I was always 11 being watched and I was. They would 12 listen in on my class, you'd hear the 13 intercom click on and off and they 14 would listen in. He had kids that 15 would go to report to him about my 16 behavior. 17 The biggest thing was, he 18 would listen in and my students got 19 so upset with it that I remember one 20 of them climbing up on the chair and 21 blasting something very loud in the 22 intercom. You know, putting 23 something up to the speaker and 24 making a really loud noise, because 25 they were so upset that they were</p>

Page 22	Page 24
<p>1 being spied on.</p> <p>2 Q Now, there was the evaluation</p> <p>3 of your performance after the first</p> <p>4 year?</p> <p>5 A Yes.</p> <p>6 Q Was that a negative or a</p> <p>7 positive?</p> <p>8 A Yes. Very negative. I ended</p> <p>9 up with an unsatisfactory rating and</p> <p>10 may I say that prior to being at</p> <p>11 Meadville High School I was at</p> <p>12 Cochranon and I received nothing but</p> <p>13 outstanding evaluations from the</p> <p>14 principal, Lynn Dixon.</p> <p>15 Q Now, this is Exhibit Two.</p> <p>16 I'll show you a copy of what has been</p> <p>17 marked Plaintiff Exhibit Two. It's</p> <p>18 the decision rendered by an</p> <p>19 Arbitrator, William Heckin, relative</p> <p>20 to apparently a complaint that you</p> <p>21 filed as a consequence of</p> <p>22 unsatisfactory rating received by Mr.</p> <p>23 Desher. And I would ask if you</p> <p>24 recognize this document?</p> <p>25 (Plaintiff Exhibit Number</p>	<p>1 explain, other than at a certain</p> <p>2 point they decided that they wanted</p> <p>3 me out of that position and they</p> <p>4 treated me in such a way as to</p> <p>5 fulfill that. They were going to</p> <p>6 remove me from that position and</p> <p>7 their way of doing it was to give me</p> <p>8 an unsatisfactory. And if I had not</p> <p>9 filed the grievance, if I had</p> <p>10 received one more unsatisfactory</p> <p>11 rating I would have been removed from</p> <p>12 that position. I would have been</p> <p>13 removed from the school district.</p> <p>14 Q And this was in 1990-'91</p> <p>15 school year?</p> <p>16 A Yes, it was.</p> <p>17 Q Okay. And the next school</p> <p>18 year, '91-'92 school year, what was</p> <p>19 your evaluation like?</p> <p>20 Ah --- I'm not understanding.</p> <p>21 Q Subsequent school year?</p> <p>22 A When I was moved to another</p> <p>23 building?</p> <p>24 Q Oh, you were moved to another</p> <p>25 building?</p>
Page 23	Page 25
<p>1 Two marked for</p> <p>2 identification.)</p> <p>3 A Yes.</p> <p>4 BY ATTORNEY NICHOLS:</p> <p>5 Q Do you recognize Exhibit Two</p> <p>6 as Arbitration decision rendered by</p> <p>7 William Heckin on your complaint?</p> <p>8 A Yes, I do.</p> <p>9 Q And I notice that you agree</p> <p>10 with what's sustained by the</p> <p>11 Arbitrator; that is correct?</p> <p>12 A Yes. Correct.</p> <p>13 Q And I notice also in the</p> <p>14 evaluation, the scoring that</p> <p>15 virtually --- I notice also in the</p> <p>16 scoring that in the certain parts of</p> <p>17 the --- it looks like the evaluation</p> <p>18 of a preparation plan instruction,</p> <p>19 the teacher-student action management</p> <p>20 you received satisfactory.</p> <p>21 A Yes.</p> <p>22 Q But on the other part you</p> <p>23 received unsatisfactory. Can you</p> <p>24 explain that?</p> <p>25 A No, I can't. I cannot</p>	<p>1 A Right. Even though I --- one</p> <p>2 of the reasons I --- one of the other</p> <p>3 reasons I filed a grievance is</p> <p>4 because they removed me from that</p> <p>5 position and put me at Cochranon</p> <p>6 Elementary and gave the male teacher,</p> <p>7 Mr. Gettys, my position. And after</p> <p>8 two years I was removed. They filed</p> <p>9 the unsatisfactory ratings against</p> <p>10 me. I filed the grievance, but I</p> <p>11 never received my position back. The</p> <p>12 district never repaired that damage.</p> <p>13 Q Who ordered your removal from</p> <p>14 the senior high school to you say</p> <p>15 elementary school.</p> <p>16 A To Cochranon Elementary.</p> <p>17 Q Who ordered that? Was that</p> <p>18 Mr. Desher?</p> <p>19 A I believe he had a part in it.</p> <p>20 Yes. I'm not sure whether it was Mr.</p> <p>21 LaScala, Mr. Desher or --- it was</p> <p>22 one of those two gentlemen. I guess</p> <p>23 I always believed it was the two</p> <p>24 together that made that decision.</p> <p>25 Q How was that effected? Did</p>

<p>Page 26</p> <p>1 <del>they</del> write you a written order? Was  2 <del>there</del> a written order saying that you  3 <del>are</del> to leave one school and go to  4 <del>another</del>?  5 A Yes. I remember the day like  6 it was yesterday. We were getting  7 ready to take our son to the  8 Pittsburgh Zoo and the mail came and  9 I received a certified letter and  10 said that you will be --- you will  11 report to Cochran Elementary  12 School. That you will no longer be  13 teaching at Meadville High School.  14 Q And this was at the conclusion  15 of this second year?  16 A At the school year. Yes.  17 Q That conclusion of the second  18 year?  19 A Yes.  20 Q Did they articulate reasons  21 why they were ordering you to move  22 from ---  23 A No. They only ---.  24 Q --- one school to another?  25 A The only thing I was told by</p>	<p>Page 28</p> <p>1 order that you move from one school  2 to another, was conscience and  3 deliberate?  4 A Oh, without a doubt. Without  5 a doubt. I have no doubt in my mind.  6 It was meant to be a punishment and  7 it was to the extent that as soon as  8 I could get out of the district and  9 end my teaching career the better I  10 would be, because I lived through  11 hell.  12 Q Now, you said for the record  13 that you felt that you --- you call  14 this a horrifying experience and you  15 attributed it at least in part to  16 your gender. Are there other reasons  17 other than your gender that you feel  18 that you were subjected to this  19 horrifying experience?  20 A There could possibly be no  21 other reason because I was a very  22 good teacher. I was the type of  23 teacher you would want your child to  24 have.  25 Q Okay. I notice that you</p>
<p>Page 27</p> <p>1 the principal at Cochran  2 Elementary was that since I seemed to  3 do okay at Cochran Elementary that  4 he was required to keep an eye on me.  5 And that's why I went to Cochran  6 Elementary. And you know, ---.  7 Q Was this okay with you?  8 A No. I was devastated. It was  9 punishment.  10 Q You saw it as a punishment?  11 A Oh, without a doubt. I was  12 more qualified and they handed a man  13 with less qualifications this art  14 position over me who had more  15 qualifications.  16 Q You saw this as a demotion?  17 A Oh, without a doubt. It was  18 meant to be a demotion.  19 Q You saw it as possible  20 derailing your professional career?  21 A Definitely. Without a doubt.  22 Q And you thought --- was it  23 your feeling that these actions on  24 the part of the administrators,  25 whoever did order it --- made this</p>	<p>Page 29</p> <p>1 physically moved. I think it's fair  2 to say you feel that you have --- you  3 feel you've been damaged  4 professionally?  5 A Oh, without a doubt. As an  6 example of how I was damaged, when  7 another opening came in the district  8 in 1993, I bid into a new position,  9 and it was a ceramics department at  10 their junior high. And upon  11 arriving, after I received the bid  12 and upon arriving to get my room in  13 order, I was met by a number of  14 teachers who told me they knew all  15 about me from Mr. Gettys, the art  16 teacher that took my place at  17 Meadville High School, and I got an  18 earful. That's the most humiliating  19 thing that you could imagine.  20 So there I was in a new  21 building, getting a --- not to  22 mention I was six months pregnant,  23 they let me know what they thought of  24 me and treated me very poorly. They  25 watched me very carefully. They</p>



<p>Page 30</p> <p>1 turned me into the principal for  2 every little thing you could ever  3 imagine. They told him how I stood  4 in the doorway or stood in the  5 hallway. It was just unimaginable  6 the things that they --- every move I  7 made they reported me to the  8 principal, because of their friends  9 reporting to them about me.  10 Q You think Mr. Deshner had  11 anything to do with that?  12 A Oh, without a doubt. It was  13 Mr. Gettys and Mr. Deshner turned my  14 reputation into dirt.  15 Q And that was after you had  16 left Meadville High?  17 A It was the whole --- during  18 the time those two years that I was  19 at the high school and ---  20 Q What I'm talking about is  21 after you left?  22 A No. That was two years later,  23 two or three later.  24 Q Then you went to the  25 elementary school?</p>	<p>Page 32</p> <p>1 the junior high?  2 A Just a few months, because I  3 was pregnant when I started the  4 school year and I delivered ---  5 actually I went into labor on a  6 Thursday when I was teaching and  7 never returned after that. It was  8 December 16th or 15th, I believe was  9 my last day.  10 Q Okay. Now, it's obvious that  11 you have suffered and that you have  12 been wronged as documented in this  13 report.  14 A Yes. No doubt.  15 Q I'm referring to the  16 Arbitration Award. Now, have you  17 been made whole? When I say made  18 whole, in terms of your professional  19 career having been damaged either in  20 terms of compensation or has there  21 been any special remorse on the part  22 of the administrators who did this?  23 A Nothing. No. Because  24 actually the --- you know, the  25 statement said that I had basically</p>
<p>Page 31</p> <p>1 A I went to the elementary  2 school I believe for two years, and  3 then the third year when I bid into  4 the junior high position, which was  5 where Mr. Gettys was when he wanted a  6 high school position ---  7 Q So are you telling us that  8 this horrifying experience ---  9 A It continued.  10 Q --- that it continued even  11 after you left?  12 A Oh, without a doubt. Without  13 a doubt. Because my principal at  14 Cochran Elementary told me that he  15 was instructed to watch every move I  16 made.  17 Q I see. All right. And how  18 long were you there at the elementary  19 school?  20 A I believe just two years after  21 the experience at the high school I  22 was there for two years and then the  23 third year I moved to the junior  24 high.  25 Q And how long did you stay at</p>	<p>Page 33</p> <p>1 won the case, but I wasn't returned  2 to my position, my teaching position.  3 I was ---  4 Q Did you ask to be returned  5 there?  6 A Yes, I did. And they said  7 that that was not accept --- that was  8 not something that they were planning  9 to do and I was still being punished  10 because I was being watched by Lynn  11 Dixon, who was the principal at  12 Cochran Elementary.  13 Q Were you compensated in any  14 way?  15 A No. No. Never. Never  16 compensated. The only thing that was  17 did was make me never want to teach  18 again. As soon as I was able to get  19 out of the classroom I did that,  20 because it was just --- it was not  21 the experience that would make you  22 ever want to stay in the district and  23 give your heart and soul.  24 Q Okay.  25 ATTORNEY NICHOLS:</p>



Page 34	Page 36
<p>1 A right. Counsel, I 2 have no other questions, 3 Counsel. 4 ATTORNEY HEATH: 5 Do you need a minute? 6 A In okay. 7 EXAMINATION 8 B ATTORNEY HEATH: 9 My name is Robin Binder Heath 10 and I represent the Crawford Central 11 School District and the current 12 superintendent and the assistant 13 superintendent in an action that Ms. 14 Gleason has brought against them 15 concerning alleged discrimination 16 based on her gender and her national 17 origin and received disability 18 concerning her mental state. And I'm 19 here to represent the school 20 district's position in this lawsuit 21 and ask you some follow-up questions 22 from what Counsel has asked you 23 already. 24 Just so I'm clear about a 25 couple of things. You indicated that</p>	<p>1 lose any money. 2 Q And when you were moved back 3 to the elementary position I 4 understand you didn't want to be, but 5 it was the same salary step; is that 6 correct? 7 A That's correct. 8 Q Under the contract? 9 A That's correct. 10 Q And the grievance that was 11 marked as Plaintiff's Exhibit Two 12 related to your unsatisfactory 13 evaluation? 14 A That's correct. 15 Q But it didn't have anything to 16 do with moving your position? 17 A Well, --- 18 Q Well, it doesn't indicate 19 here ---. 20 A It doesn't indicate there, but 21 the reason I was moved was all tied 22 in to that. They didn't just move me 23 on a whim. That was out of the 24 contract. You couldn't do that to a 25 teacher because of our teaching</p>
Page 35	Page 37
<p>1 --- now, this grievance that was 2 marked as Plaintiff's Exhibit Two, 3 you filed it June 11th of 1991; is 4 that correct? 5 A I believe, if that's what it 6 says. That's correct. 7 Q And if you look at the last 8 page it was decided in 19 --- May 9 20th of 1992? 10 A Okay. 11 Q So it was about 14 years ago; 12 is that accurate? 13 A Yes. Uh-huh (yes). 14 Q And when Mr. Nichols asked you 15 if you've been compensated, you never 16 lost any money, any salary; is that 17 correct, as a result of your working 18 with ---? 19 A No. 20 Q Let me just finish my 21 question. 22 A No. 23 Q Working with the school 24 district; is that correct? 25 A That's correct. They did not</p>	<p>1 contract. 2 Q Correct. So my question to 3 you is, because then you were moved, 4 did you file an additional grievance 5 or try to seek additional redress to 6 your union for their being in 7 violation to collect a bargaining 8 agreement for moving you into 9 position that you didn't want to be 10 in? 11 A Well, because I was being 12 guided by the union, that was all in 13 one package, you know, as my 14 understanding was. That it was the 15 unsatisfactory rating was one thing 16 that they were dealing with and the 17 other item that they were dealing 18 with was the fact that I was moved as 19 a punishment because of the 20 unsatisfactory ratings. 21 Q And when you were on your 22 grievance ---? 23 A They --- the district said, 24 no. 25 Q That's what I'm asking you,</p>

Page 38	Page 40
<p>1 did you ever file with your union to 2 try to then retain your position, --- 3 A.No. 4 Q--- regain your position? 5 A.No. 6 Q At the time, who was your 7 union president? 8 A Grant Shorts, I believe was 9 the president. 10 Q Who were your union 11 representatives that you were dealing 12 with, do you remember? 13 A I believe Jay Froth (phonetic) 14 was one, Grant Shorts and I'm not 15 clear on the names of the others. 16 Q Did you deal with Patricia 17 Dearloff? 18 A Yes. She was at my grievance 19 --- like the meetings that we would 20 have with the attorney, she was 21 present, I believe, if I'm 22 remembering her role correctly. I 23 believe Pat also participated. 24 Q And just because we're on the 25 record here, I just wanted to make it</p> <p style="text-align: right;">Page 39</p>	<p>1 an issue with this district that they 2 thought you were Italian? 3 A.No. But that I was a female 4 and I definitely had an ethnic look 5 to me, you know. I think that was an 6 issue. 7 Q Did you --- I'm sorry. Did 8 you suffer from any disability or 9 does the district perceive you from 10 suffering any disabilities, 11 physically or mental? 12 A You know, I regret to this day 13 that I didn't file a suit because of 14 the anguish that I went through. I 15 was a new mother and I remember 16 sitting nights and just crying 17 because of what I was going through. 18 It's like it was yesterday. I can 19 remember just crying night after 20 night. I was so, so upset, so hurt, 21 so distraught and I regret to this 22 day that I didn't take legal action. 23 Q On what? 24 A On the grounds that it was 25 harassment because I was a female.</p> <p style="text-align: right;">Page 41</p>
<p>1 clear. You're a Caucasian female; 2 correct? 3 A Yes. But my appearance is 4 much different now then it was --- as 5 a matter of fact when Claudette 6 walked in the door she noted that she 7 didn't really recognize me. When I 8 taught at that time I had very long 9 hair probably down to my waist, it 10 was black. I highlight it now so 11 that's why it appears to be blonde 12 because I have a lot of gray, so ---. 13 But I had very dark hair, very 14 tanned skin, Italian looking. A lot 15 smaller, you know, after --- since 16 then I gave birth to two kids so I 17 definitely had a smaller belt. But I 18 was --- my appearance was drastically 19 different then ---. 20 Q You're saying you looked 21 Italian? 22 A Oh, yes. Definitely. Because 23 I always had a nice tan before I 24 started to worry about wrinkles. 25 Q Well, did you think that was</p>	<p>1 Q But you didn't suffer from any 2 --- they didn't think you suffered 3 from any disability, physically or 4 mentally? 5 A Who didn't think? 6 Q The district, is that 7 accurate? 8 A I didn't go that route. 9 Q I mean, you didn't say, I have 10 issues, I have postpartum depression, 11 you didn't tell them that; did you? 12 A No. It had nothing to do with 13 the direction we had gone at that 14 time. 15 Q And at the time when you were 16 at the Meadville High School, the 17 assistant principal was a female; 18 correct? 19 A Yes. 20 Q That was Carol Templeton? 21 A Yes. 22 Q And did you feel --- that 23 didn't make you have any comfort 24 level? 25 A No. I think that she was told</p>

<p>Page 42</p> <p>1 b y a male administration to get me 2 out of there. 3 Q And percentage-wise, how would 4 you characterize the schools that you 5 were affiliated with the Crawford 6 Central School District? Would you 7 say there's a higher percentage of 8 women teachers versus male teachers? 9 A I thought there were a lot of 10 men teachers, but I don't know the 11 percentage. The majority of the 12 people that when I would work in the 13 teachers lounge and do my lesson 14 plans and different things, I recall 15 always being a large number of males. 16 Q Other than --- and for now the 17 Claude thing on the side, but 18 other than Ms. deLeon, did you ever 19 have any other female teachers say 20 that they believe that there's gender 21 bias? 22 A I didn't talk to a lot of 23 teachers because of the treatment 24 that I received from the 25 administration. I felt that I was</p>	<p>Page 44</p> <p>1 classes. You were still paid your 2 full salary, is that correct? 3 A Yes. I wasn't given the job 4 that I had bid into. I was --- I'd 5 bid into the photography position and 6 end up having to share my photography 7 position with him. Which, you know, 8 if you're hired for a position and 9 outbid somebody, how do you end up 10 sharing the position? 11 Q Now, I understand that, but 12 Mr. Nichols had been asking you about 13 compensation. 14 A I know. 15 Q I just want to make sure that 16 we're clear, monetarily, that you 17 were paid your full salary? 18 A I was paid my full salary, but 19 I have not taught since --- 20 Q I understand. 21 A --- 1993 because I just 22 couldn't do it anymore. 23 Q I understand. You said with 24 regard, for example, ordering 25 supplies. Now, I maybe was wrong</p>
<p>Page 43</p> <p>1 being --- I didn't want to put a toe 2 out of line. I tried very carefully 3 not to talk to a lot of people in 4 general because I was afraid of 5 somebody going back and reporting 6 something. 7 Q So the answer would be no? 8 A No. 9 Q It wasn't a discussion that 10 you had? 11 A No. No. 12 Q With regard to Mr. Gettys, you 13 said he was --- at least you believe 14 he was a friend of Mr. Deshner? 15 A I believe they were friends. 16 Q And so you believe that the 17 primary issue when you first started 18 was because you felt the 19 administration, particularly Mr. 20 Deshner, wanted his friend in that 21 position? 22 A Uh-huh (yes). Uh-huh (yes). 23 Q And you said that he --- you 24 were sharing a room with him at that 25 time and he said he was teaching some</p>	<p>Page 45</p> <p>1 about this, but typically in my 2 experience, because the budget has to 3 be finalized at the end of June in 4 the school district, everybody for 5 the next year has to get in their --- 6 A Very early. 7 Q --- budget supply that spring, 8 at least, is that correct? 9 A No. It's actually due before 10 that. 11 Q Before that. So the first 12 year you went to the high school you 13 wouldn't have been ordering supplies 14 anyway? 15 A Right. Right. 16 Q So you would have had one year 17 where you said you were not permitted 18 to order supplies for the next year? 19 A Right. Uh-huh (yes). 20 Q And who was ordering the 21 supplies? 22 A I believe Mr. Gettys did. 23 Q Did you see a list or anything 24 in that nature? 25 A No.</p>

1 Q Okay.

2 A But it was more than just the  
3 supplies, it was just the attitude  
4 that --- it was just an example of,  
5 you know, how I was not treated as if  
6 I even existed or was of any

7 importance in that position. It was  
8 always up to Mr. Gettys what was  
9 occurring and how things were done.

10 And he made it clear to me that he  
11 was the one that knew photography and  
12 I didn't. That was his opinion.

13 Q And you said that you believe  
14 that Mr. Desher was targeting you  
15 because you were a woman and one who  
16 knew what they were doing?  
17 A That's correct.

18 Q Did he ever make any comment  
19 about you that related to your  
20 gender?

21 A That related to my gender? I

22 don't remember specifically comments

23 that related to my gender. It was

24 just the treatment that he gave me  
25 and I think it was because of my

1 gender.

2 Q And as you sit here today,

3 it's your testimony that I understand

4 when you were at Cochran you were

5 teaching K through 8 art classes?

6 A No. Cochran ---

7 Q I'm sorry.

8 A --- was K through sixth.

9 Q K through sixth?

10 A Uh-huh (yes).

11 Q Before you went to the high

12 school?

13 A Before I went to the high

14 school.

15 Q And that was art classes?

16 A That's correct.

17 Q And then you got satisfactory

18 evaluations?

19 A Always. And comments, very

20 positive comments without a doubt.

21 Q And the next job then you went

22 to the high school?

23 A Uh-huh (yes).

24 Q So it's older students and you

25 were teaching photography, is that

1 correct?

2 A Uh-huh (yes).

3 Q And you would agree that's a

4 totally different student group?

5 A Teaching is teaching.

6 Q And totally different

7 curriculum?

8 A I teach adults. I was --- in

9 the past I've taught pre-schoolers.

10 When you teach it doesn't matter the

11 age level. I'm competent to teach at

12 any level ---

13 Q I understand your certificate

14 would be K through 12?

15 A Right. I'm competent to teach

16 at any level and I did an extremely

17 good job.

18 Q And you didn't encounter any

19 difficulty?

20 A Not with my students. Other

21 than the normal ones that you go over

22 with being a new teacher in a new

23 building, which were minor.

24 Q At your Arbitration Hearing

25 prior to rendering the decision which

1 was has been marked as Plaintiff's

2 Exhibit Two, did you provide any

3 testimony concerning your feeling

4 that you were targeted because of

5 your gender?

6 A At the testimony?

7 Q At the hearing?

8 A I'm not sure what we discussed

9 as far as I don't know that we --- I

10 don't recall ever being asked why

11 they were targeting me. I don't

12 remember ever being asked that.

13 Q Okay. Would you agree with me

14 that the decision itself hasn't

15 mentioned anything about any

16 allegations of gender bias?

17 A Well, it doesn't mention my

18 position being moved either. So we

19 didn't cover ---

20 Q Well, I'm just asking ---

21 A That's correct. It doesn't

22 cover every item that occurred in my

23 experience teaching there.

24 Q And as far as you know,

25 however, you don't recall whether you

Page 50	Page 52
<p>1 testified or you don't believe you 2 testified about having gender bias 3 occur at this particular hearing? 4 A I do remember testifying that 5 I didn't understand, you know, why 6 --- you know, someone that taught 7 that was as professional as I was and 8 that's successful as I was in the 9 classroom would have to go through 10 something like that. I remember 11 specifically being confused about 12 that --- 13 Q Again --- 14 A --- and I think --- I don't 15 recall testifying to that, but it 16 doesn't mean that it isn't the case. 17 Q No, I'm not saying. I'm just 18 asking you, it's not addressed in 19 this case, correct? 20 A Right. Right. But there's a 21 lot of things that aren't addressed 22 in that grievance. 23 Q Well, again, when I asked you 24 about moving, for example, your 25 position, you believed it was</p>	<p>1 that something that you believe is 2 totally invalid? 3 A Yes. Without a doubt. 4 Q And you do agree that you had 5 issues with Mr. Deshner? 6 A No. I believe Mr. Deshner had 7 issues with me. 8 Q Other than the time he --- you 9 recounted that he screamed at you in 10 the hallway, did you have any 11 confrontations with him or any other 12 administrator? 13 A No, I believe briefly after 14 that he put Ms. Templeton on to my 15 situation and she continued with the 16 --- I don't know what you would call 17 it, the abuse. 18 Q So you didn't get along with 19 Ms. Templeton either? 20 A She would --- no, she treated 21 me with a great deal of disrespect. 22 She --- they spied on me, they would 23 not let me have a union 24 representative in when I would have 25 evaluations with her and she would be</p>
Page 51	Page 53
<p>1 consumed in this particular 2 agreement. But when they didn't put 3 you back in the position, it was 4 something that you followed up on? 5 A Right. Right. 6 Q In looking at this decision, I 7 just --- I'm quickly glancing at the 8 --- there's your evaluation that's 9 contained in part of the decision 10 itself and one of the areas that you 11 received unsatisfactory were a couple 12 of the areas that would be in 13 response to supervision and also 14 would --- comments it says with 15 ability to cooperate, very 16 uncooperative towards administrative 17 suggestions and directives. It does 18 say cooperative with staff members. 19 And then on the next page of 20 page six of the decision it 21 indicates, she, being you, has little 22 respect for policies or directions. 23 She isn't in agreement with 24 consistently undermining 25 administrative authority. Now, is</p>	<p>1 very rude and nippick and say 2 inappropriate things to me. 3 Q Such as? 4 A Just, you know, that I was 5 unprofessional, that I was --- you 6 know, just nippicked about things 7 that were appropriately done, but she 8 --- I think was on --- was told to 9 find something wrong with me and she 10 worked very hard at fabricating and 11 coming up with things just to write 12 an evaluation to try to get rid of 13 me. So no, I was never uncooperative 14 with the administration. I was never 15 --- you know, I was in fear of losing 16 my job because they were looking for 17 something. I can tell that they were 18 looking for something to find fault 19 with and to get rid of me. 20 Q You said about the spying. 21 For example, you said, the intercom 22 would click on and off. 23 A Well, you would know when the 24 morning announcements were coming 25 because you hear that little click</p>



<p>Page 54</p> <p>1 and then they would speak or when 2 they would call to your room and say 3 we need such and such student to come 4 down to the office, you would hear 5 that little click and then they would 6 wait, you know, for your answer. We 7 would always hear the little click 8 and the whole class would look up 9 like, they're listening to you, you 10 know, kind of thing. Because even 11 the students were aware from Mr. 12 Deshner. I had a couple of students 13 that he was friends with that he 14 shared this information with. 15 Q Now, did you go to your union 16 about that? 17 A Yes. Oh, they knew. They 18 knew about all of that. 19 Q Did they try to help you? 20 A Well, through the grievance 21 they did. 22 Q But this was really basically 23 --- was this --- the listening in, 24 was that before the incident? 25 A The listening in was that ---.</p>	<p>Page 56</p> <p>1 Q And who are these teachers? 2 A I don't remember their names. 3 Q Were they male or female? 4 A They were male. 5 Q And were they art teachers 6 or ---? 7 A No. Well, no. I'm trying to 8 think what classes were across the 9 hall. Math or science. They were 10 male. 11 Q And how many of them? 12 A Two or three. 13 Q Do you recall anything 14 essentially that they said to you? 15 A No, other than they heard all 16 about me. That --- just told me what 17 a terrible person I was. Just things 18 like that. 19 Q Because of why ---? 20 A What I've done to Mr. Gettys 21 taking his position at the high 22 school, you know. That was their 23 take on it. You know, and they also 24 just made comments in general about 25 what a trouble maker I was. Because,</p>
<p>Page 55</p> <p>1 Q The year of the incident? 2 A I believe it was both years. 3 Q Both years? 4 A Both years. 5 Q And then you went to another 6 school? 7 A Uh-huh (yes). 8 Q And who was the principal at 9 the other school? 10 A Lynn Dixon. 11 Q Is that a male or female? 12 A It's a male. 13 Q Is it Lynn or Lyn? 14 A Lynn, L-Y-N-N. 15 Q And then you said that you 16 ended up bidding into a junior high 17 position, correct? 18 A That's correct. 19 Q And you said that when you 20 went there you were met by a number 21 of teachers who said that they knew 22 all about you and said unkind things 23 to you? 24 A Uh-huh (yes). Right. From 25 Mr. Getty. They were ---.</p>	<p>Page 57</p> <p>1 you know, all they knew was what Mr. 2 Gettys had told them. 3 Q And I'm assuming this from 4 what you said. You didn't get along 5 at all with Mr. Gettys? 6 A I didn't have any problem with 7 Mr. Gettys. 8 Q You're saying he had a problem 9 with you? 10 A Yes. 11 Q Did you ever try to discuss it 12 with him? 13 A I didn't ever try to discuss 14 it with him because he let it be 15 known to a lot of people that he 16 disliked me. 17 Q Simply because you bid into 18 the position? 19 A Uh-huh (yes). That he was led 20 to believe this was by Mr. Deshner. 21 Q Now, it seems to me that you 22 would have a bigger issue with other 23 people since you were just following 24 the contract agreement. 25 A But --- I don't know. I don't</p>



Page 58	Page 60
<p>1 Kew.</p> <p>2 Q And you said you thought that</p> <p>3 these fellow teachers turned you into</p> <p>4 the principal at the middle school?</p> <p>5 A Yes.</p> <p>6 Q Junior high.</p> <p>7 A Because I was called in --- as</p> <p>8 an example, I had a student teacher.</p> <p>9 And instead of --- you know, the</p> <p>10 student teachers take over your</p> <p>11 teaching position at a certain point.</p> <p>12 And I had in-school suspension and I</p> <p>13 let --- the student teacher went to</p> <p>14 the in-school suspension. After</p> <p>15 going there with the student teacher</p> <p>16 several times I felt that they would</p> <p>17 be able to do that on their own. And</p> <p>18 Plus it was just, you know, a short</p> <p>19 distance from my room and I would</p> <p>20 walk by and check --- listen at the</p> <p>21 door and check on that student</p> <p>22 teacher.</p> <p>23 Well, they turned me in saying</p> <p>24 that, oh, how unprofessional, she's</p> <p>25 dumping on her student teacher, her</p>	<p>1 high?</p> <p>2 A He was very kind to me, they</p> <p>3 --- I didn't have any trouble.</p> <p>4 Q And who was that?</p> <p>5 A I can't even --- I can't</p> <p>6 recall.</p> <p>7 Q And when you then went into</p> <p>8 labor and had your baby in December,</p> <p>9 what year was that?</p> <p>10 A That was December of '93.</p> <p>11 Q You said you never returned?</p> <p>12 A Well, I took --- I had a lot</p> <p>13 of sick days accumulated so I took my</p> <p>14 sick days and then I took the</p> <p>15 parental leave and then because I</p> <p>16 still wasn't sure if I could go back,</p> <p>17 they gave me an extension. I believe</p> <p>18 I almost had two years to decide and</p> <p>19 I just couldn't do it.</p> <p>20 Q And even though that was ---</p> <p>21 and you would have gone back to the</p> <p>22 junior high?</p> <p>23 A Right. Uh-huh (yes).</p> <p>24 Q And you didn't have a problem</p> <p>25 with administration?</p>
Page 59	Page 61
<p>1 student teacher, you know, shouldn't</p> <p>2 be in there. Just everything you can</p> <p>3 imagine they turned me in for.</p> <p>4 Q Other than that can you think</p> <p>5 of anything else?</p> <p>6 A Now, he ---</p> <p>7 Q I know it's a long time ago.</p> <p>8 A When the principal called me</p> <p>9 in he apologized and he said that he</p> <p>10 understood that, you know, I came in</p> <p>11 with a bad reputation and that these</p> <p>12 people were giving me a hard time and</p> <p>13 he wanted to talk to me about it and</p> <p>14 let me know what was going on. He</p> <p>15 didn't make me go into the room that</p> <p>16 my student teacher was doing the</p> <p>17 in-school suspension. So basically</p> <p>18 he was just informing me that I was</p> <p>19 being watched by these people and he</p> <p>20 was getting his reports.</p> <p>21 Q Was it the same two or three</p> <p>22 people?</p> <p>23 A My understanding, yes.</p> <p>24 Q And how did you get along with</p> <p>25 the administration at the junior</p>	<p>1 A No, I didn't have a problem</p> <p>2 with administration, but all of the</p> <p>3 teachers I felt ---</p> <p>4 Q Or at least two or three?</p> <p>5 A Two or three. But they all</p> <p>6 talked and I felt very uncomfortable.</p> <p>7 I was never, you know --- can you</p> <p>8 imagine being nine months pregnant</p> <p>9 and no one even saying how do you</p> <p>10 feel, how are you today? Not one.</p> <p>11 Q So you decided it was not</p> <p>12 something you wanted to return to?</p> <p>13 A No. And really, you know, at</p> <p>14 that point, we were living in Mercer,</p> <p>15 Lake Latonka. We actually after all</p> <p>16 of this went on at the high school</p> <p>17 made the decision to sell our home,</p> <p>18 because I couldn't bring my child ---</p> <p>19 my children up through the district</p> <p>20 after they permitted what went on</p> <p>21 with me. I could not in good faith</p> <p>22 send my children to a district that</p> <p>23 permitted that to happen.</p> <p>24 Q And you had just said earlier</p> <p>25 that you're a published author;</p>

Page 62	Page 64
<p>1 correct?</p> <p>2 A. Yes. I have three books.</p> <p>3 Q. That's very impressive. When</p> <p>4 did you do that?</p> <p>5 A. I started that in --- let me</p> <p>6 think of the time, right about the</p> <p>7 time that I started to go through all</p> <p>8 of this in 1992, I believe when I</p> <p>9 made the decision that I needed to</p> <p>10 get out, '92, '93 was prior to ---</p> <p>11 because I was finishing my first book</p> <p>12 when I was a month pregnant with my</p> <p>13 second child. So I decided I needed</p> <p>14 to find some way to get out of</p> <p>15 teaching.</p> <p>16 Q. And then subsequently then you</p> <p>17 published the other two books?</p> <p>18 A. Two books, yes.</p> <p>19 Q. What years was that?</p> <p>20 A. The last book was published in</p> <p>21 --- probably three years ago.</p> <p>22 Q. So around 2003?</p> <p>23 A. Yes. Uh-huh (yes). They're</p> <p>24 art.</p> <p>25 Q. The first one?</p>	<p>1 assistant superintendent. The only</p> <p>2 interaction I would have had</p> <p>3 initially with him was he was the</p> <p>4 principal at Meadville High School</p> <p>5 the year I substituted before I was</p> <p>6 hired full time. He was the one who</p> <p>7 interviewed me and gave me the</p> <p>8 position, which was kind of confusing</p> <p>9 because he knew the quality teacher I</p> <p>10 was.</p> <p>11 But yet he, I felt, was part</p> <p>12 of this --- he didn't do anything to</p> <p>13 help the situation. I felt that he</p> <p>14 was on Mr. Deshner and Ms. Templeton</p> <p>15 and Mr. Gettys' side as far as ---</p> <p>16 you know, I always felt that there</p> <p>17 was something --- some reason why,</p> <p>18 you know, there was this group of men</p> <p>19 --- it was like you hear the good old</p> <p>20 boys' club, you know. I felt like I</p> <p>21 couldn't win, because there was the</p> <p>22 good old boys' club getting me out of</p> <p>23 a position and it was confusing</p> <p>24 because he knew the quality teacher I</p> <p>25 was. But there was some alliance or</p>
Page 63	Page 65
<p>1 A. Was in early the '90s.</p> <p>2 Q. And then the other one is</p> <p>3 somewhere in between?</p> <p>4 A. Yes.</p> <p>5 Q. And what kinds of books are</p> <p>6 these?</p> <p>7 A. They are art education books.</p> <p>8 They're designed for classroom</p> <p>9 teachers. They combined --- two of</p> <p>10 the books combined art and children's</p> <p>11 literature and one book combines art</p> <p>12 and advertising. And they're lessons</p> <p>13 that a classroom teacher, ordinary</p> <p>14 teacher can use to integrate art and</p> <p>15 literature in their classroom. And</p> <p>16 they're step-by-step-type books that</p> <p>17 guide the reader through a process so</p> <p>18 that they can end up with the</p> <p>19 finished product with their students.</p> <p>20 Q. Is it elementary age?</p> <p>21 A. They're elementary, yes.</p> <p>22 Q. Other than Mr. Deshner, did</p> <p>23 you have much interaction with the</p> <p>24 superintendent, LaScala?</p> <p>25 A. At the time he was the</p>	<p>1 some connection he had with Mr.</p> <p>2 Gettys and Mr. Deshner that kept him</p> <p>3 from doing the right thing. And the</p> <p>4 right thing was to get them to stop</p> <p>5 harassing me and to let me do the job</p> <p>6 I was hired to do without the stress</p> <p>7 and the --- it was just ---</p> <p>8 Q. And somehow Ms. Templeton was</p> <p>9 in this good old boys' club?</p> <p>10 A. She --- yes, she was. Because</p> <p>11 I think her instructions were ---</p> <p>12 because we don't want to be perceived</p> <p>13 as being, you know, going after this</p> <p>14 woman for sexual harassment because</p> <p>15 we're men. You're going to do our</p> <p>16 dirty work.</p> <p>17 Q. And that was just your</p> <p>18 conclusion?</p> <p>19 A. That is my conclusion because</p> <p>20 of what I've observed.</p> <p>21 Q. And meaning anything specific?</p> <p>22 A. Just --- no. Nothing</p> <p>23 specific, but you know, I'm a lot</p> <p>24 older now and I feel that if I was</p> <p>25 this age and I had gone through that</p>

<p>Page 66</p> <p>1 that, there would have been a lawsuit  2 filed by me. And I just regret never  3 filing that lawsuit, because I think  4 then they were free to go on and do  5 what they did to me to somebody else.  6 Nothing was there to stop them except  7 a little slap on the wrist, oh, take  8 away her unsatisfactory rating.  9 But the damage --- no. It  10 wasn't monetary damage because I  11 didn't lose my salary, but that's  12 something you can't put a price on  13 what they did to me. I had parents  14 who absolutely loved me. One of the  15 parents of a special-needs student  16 wrote a letter and specified to be  17 put in my file because she had a  18 special-need student who never  19 thought that she would ever see a  20 college classroom. And because she  21 took my photograph and I encouraged  22 this girl --- she went on to go to  23 college with her learning disability.  24 And that's the kind of teacher I was  25 and they took that away.</p>	<p>Page 68</p> <p>1 may.  2 RE-EXAMINATION  3 BY ATTORNEY NICHOLS:  4 Q1 didn't have the privilege  5 --- access to the transcript of the  6 proceeding of this arbitration  7 proceeding. But I noticed back in  8 1991, several years ago --- but if  9 you remember, if you don't, of  10 course, you can say, no, you don't  11 remember. I noticed here on the  12 facing page Mr. Deshner and Ms.  13 Templeton appeared for --- made  14 appearances and --- at the  15 arbitration proceeding. Do you  16 recall whether they testified?  17 A1 believe they did.  18 Q1f I can jog ---.  19 AYes, they did.  20 Q1f I can jog your memory, I  21 know it's been many years ago. Do  22 you recall what Mr. Deshner testified  23 to at the proceeding?  24 ANot specifically, I don't,  25 other than I just remember when both</p>
<p>Page 67</p> <p>1 QAnd you have not thought about  2 going to another district?  3 A1'm afraid to, because if they  4 call and ask for a recommendation  5 somewhere in my file I'm afraid that  6 this information will get out and  7 then I will be ruined. Somebody in  8 another district will find this out  9 and my reputation will be ---.  10 QWell, there's nothing in your  11 file ---  12 A1 don't believe that. I don't  13 believe that.  14 Q--- that would --- nor are the  15 people that were there still there.  16 AAnd I didn't know that since I  17 live an hour away, I didn't know that  18 all those people were gone.  19 QOkay.  20 ATTORNEY HEATH:  21 Thank you. I have  22 nothing further.  23 ATTORNEY NICHOLS:  24 Ms. Englebaugh, just a  25 couple more questions if I</p>	<p>Page 69</p> <p>1 of those people testified, I  2 remember, you know, thinking where  3 are they getting this from and why  4 are they doing this. You know, the  5 things they were saying that I was,  6 you know, were so untrue.  7 I just remember the feeling of  8 the day. I don't remember  9 specifically what they said, but I do  10 remember my feelings about that, that  11 --- you know, because I even remember  12 writing on a tablet, you know, tried  13 to stay calm and not cry because one  14 of the things that I, you know,  15 didn't want to let him see is me  16 getting upset because of what he was  17 doing.  18 QOkay. All right. Is it fair  19 to say as a consequences that you've  20 described as a horrifying experience  21 under the principalship of Mr.  22 Deshner at Meadville High School,  23 that that really destroyed your  24 professional career as a teacher?  25 ATTORNEY HEATH:</p>

Page 70	Page 72
<p>1 Objection to form.</p> <p>2 BY ATTORNEY NICHOLS:</p> <p>3 Q You may answer.</p> <p>4 A Definitely. After the</p> <p>5 experience that I went through with</p> <p>6 the high school and then it carried</p> <p>7 over into the elementary school</p> <p>8 because I was told that I was being</p> <p>9 watched. And then knowing that I</p> <p>10 went to another building and thinking</p> <p>11 that everything would be okay and</p> <p>12 immediately being told that I was no</p> <p>13 good and that the --- you know, the</p> <p>14 principal told me what was going on.</p> <p>15 No, I didn't feel that I could</p> <p>16 return and be an effective teacher</p> <p>17 because of the stress and the upset</p> <p>18 that I was constantly feeling over</p> <p>19 it. I mean, I still --- I've driven</p> <p>20 to Meadville. My son comes up here</p> <p>21 for baseball games or basketball game</p> <p>22 and I just get sick to my stomach</p> <p>23 when I pull into town.</p> <p>24 Q Did you seek medical</p> <p>25 attention?</p>	<p>1 A Yes.</p> <p>2 Q What was her last name at the</p> <p>3 time?</p> <p>4 A Maloney. I know someone</p> <p>5 that's Ornahaney (phonetic) and I</p> <p>6 always get it --- you know, the</p> <p>7 pronunciation ---.</p> <p>8 Q Did you work near her and was</p> <p>9 your class near her?</p> <p>10 A No. But I believe our plan</p> <p>11 period or lunch or something were at</p> <p>12 a similar time, and the art room was</p> <p>13 pretty much by itself. There wasn't</p> <p>14 a lot in that hallway, but I do</p> <p>15 recall, you know, having small chats</p> <p>16 with her. She was one of the only</p> <p>17 people that would talk to me.</p> <p>18 Q Would it be fair to say that</p> <p>19 you never had an opportunity to</p> <p>20 observe her classroom teaching?</p> <p>21 A I never had the opportunity to</p> <p>22 observe her classroom, no.</p> <p>23 ATTORNEY HEATH:</p> <p>24 Thank you.</p> <p>25 ATTORNEY NICHOLS:</p>

Page 71	Page 73
<p>1 A No, I didn't.</p> <p>2 Q You didn't?</p> <p>3 A No, I did not.</p> <p>4 Q Okay.</p> <p>5 ATTORNEY NICHOLS:</p> <p>6 All right. I have no</p> <p>7 further questions. Do you</p> <p>8 have any further questions?</p> <p>9 ATTORNEY HEATH:</p> <p>10 Just one more</p> <p>11 follow-up.</p> <p>12 RE-EXAMINATION</p> <p>13 BY ATTORNEY HEATH:</p> <p>14 Q You indicated that --- and I'm</p> <p>15 trying to get the year straight. I'm</p> <p>16 not sure I'm straight. But when you</p> <p>17 were at the senior high school,</p> <p>18 Meadville Senior High School, that</p> <p>19 was 1990 to '91, '91-'92?</p> <p>20 A No, '89 ---</p> <p>21 Q To '90?</p> <p>22 A --- to '90, '90-'91 school</p> <p>23 year.</p> <p>24 Q Okay. And during that time</p> <p>25 you knew Claudette deLeon?</p>	<p>1 Okay. Thank you for</p> <p>2 coming.</p> <p>3 A Thank you very much.</p> <p>4</p> <p>5 *****</p> <p>6 DEPOSITION CONCLUDED AT 11:23 A.M.</p> <p>7 *****</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1 COMMONWEALTH OF PENNSYLVANIA )  
2 )  
3 COUNTY OF VENANGO )

4 C E R T I F I C A T E

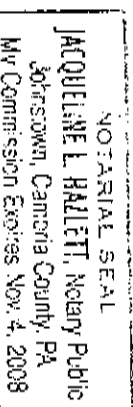
5  
6 I, Jacqueline L. Hazlett, a Notary Public in  
7 and for the Commonwealth of Pennsylvania, do  
8 hereby certify:

9 That the witness whose testimony appears in  
10 the foregoing deposition, was duly sworn by me on  
11 said date and that the transcribed deposition of  
12 said witness is a true record of the testimony  
13 given by said witness;

14 That the proceeding is herein recorded fully  
15 and accurately;

16 That I am neither attorney nor counsel for,  
17 nor related to any of the parties to the action in  
18 which these depositions were taken, and further  
19 that I am not a relative of any attorney or  
20 counsel employed by the parties hereto, or  
21 financially interested in this action.  
22  
23  
24  
25

*Jacqueline L. Hazlett*  
Jacqueline L. Hazlett, Reporter



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Apprentice & must be used in conjunction with the Philosophy and Religion Section.

Teacher \_\_\_\_\_ 10  
 Foreign Language \_\_\_\_\_  
 Dates 4-11-03 Grade Level 9 - 12  
 Years of Service as a full-time employee in the District \_\_\_\_\_  
 U - District/Factory \_\_\_\_\_

**पु - पुनः**

### PREPARATION - PLANNING

ALL PROFESSIONAL STAFF SHOULD  
CONCENTRATE TO THEIR TEACHING ASSIGNMENT.

ALL PROFESSIONAL STAFF SHOULD  
CONCENTRATE TO THEIR TEACHING ASSIGNMENT.

Has various plants, nesting charts, plus species brochures, specimens (when appropriate).  
This room is attractive and neat (use of bulletin board, posters, etc.).  
Teacher adjusts the physical features of the room to provide a meaningful and meaningful environment.  
Decor of room contributes to curriculum.

Decor of room corresponds to surroundings.

ALL PROFESSIONAL STAFF SHOULD BE

ALL PROBABLY  
EFFECTIVELY

ALL PROBABLY  
EFFECTIVELY

**These follow-up criteria are guidelines for consideration:**

- Encourages and directs student interaction.
- Attempts to motivate students in reaching levels of performance consistent with their ability.
- Provide for student involvement in planning of classroom activities.
- Provides alternative methods of study.
- Maintains class control essential to the learning process.
- Teacher demonstrates knowledge of the subject.

**Discussion**

**C. TEACHER - STUDENT INTERACTION**

## II

**ALL PROFESSIONAL STAFF SHOULD ATTEND:**  
 • Health officer and staff for compensation  
 • Compensation committee

Encourages student interaction and free expression of ideas.  
Encourages the development of desirable study habits and/or use of study time.  
Encourages the student in the planning classroom activities.  
Establishes an attitude of friendliness and a feeling of mutual interest between students and teacher, moves no favoritism or partiality.

RESPONSE TO SUPERVISION

# RESPONSE TO SUPERVISION

The following criteria were guidelines for consideration:

Compensate ability to work well and manage with a no-nonsense approach.

Observed administration policies while exercising the right to work without being interfered with. She consistently demonstrated her unwillingness to work under administration policies which she considered to be unreasonable. Respondent expressed her consistent unwillingness to improve. She has consistently used the word "fight" the administration on issues of improvement. She has lately become more verbally and physically aggressive towards the building administration.

### B. ATTITUDE

**B. ATTITUDE TOWARD ACHIEVING EDUCATIONAL GOALS.**

**D**

The following criteria are guidelines for each derivation:

15 00114 and 00114911.

is polite and considerate.

Comments: Ms. deLeon continues to exhibit a negative attitude towards administrative suggestions in regard to classroom management.



☒ U

The following criteria are guidelines for consideration:  
Maintains sound relationships and works constructively with students, parents and school personnel.  
Carries out extra duty assignments regularly.

Comment Ms. deleon has not maintained good parental contact. There have been verified violations of breach of student confidentiality. Mis-information to parents concerning student grades and missing work have later been resolved when parents have had conferences and work is found.

☐ D. MATURITY

ALL PROFESSIONAL STAFF SHOULD DISPLAY MATURITY.

☒ U

The following criteria are guidelines for consideration:  
Demonstrates self-confidence and a pleasant disposition toward students, parents and co-workers, has a sense of humor.  
Exhibits intelligent, mature behavior and conduct himself in a manner which exhibits professional dignity.

Comments Ms. deleon s negativity towards administration has been extremely unprofessional. Parents and students who question her become the targets of negative views and comments with a resulting drop in grades.

☐ E. DEPENDABILITY

ALL PROFESSIONAL STAFF SHOULD BE DEPENDABLE.

☒ U

The following criteria are guidelines for consideration:  
Is responsible in meeting education obligation.

Is punctual in meeting schedules, can be relied upon to take some initiative and cope with various circumstances which may arise.

Solves everyday problems realistically.  
Record keeping is accurate and reports are submitted promptly and neatly.

Comments Ms. deleon does not deal with classroom problems in an effective manner. She denies they have occurred, provides mis-information and does not investigate situations thoroughly to determine what happened.

☐ F. COMMUNICATION

ALL PROFESSIONAL STAFF SHOULD DEMONSTRATE THE ABILITY TO COMMUNICATE EFFECTIVELY.

☒ U

The following criteria are guidelines for consideration:  
Demonstrates appropriate use of language and voice control.

Gives clear and concise instructional directions.

Has listening ability.  
Has skill in asking pertinent questions.

Comments Ms. deleon refuses to communicate with the administration. She refuses to accept suggestions, administrators observations, and the action plan developed to help her in the classroom.

☐ G. PHYSICAL CHARACTERISTICS

ALL PROFESSIONAL STAFF SHOULD GIVE ADEQUATE ATTENTION TO PERSONAL AND PHYSICAL CHARACTERISTICS.

☒ S

The following criteria are guidelines for consideration:  
Gives adequate attention to personal grooming and appropriate dress.

Is physically fit as evidenced by regular attendance, and the ability to carry a normal assignment. (This does not apply to temporary disability).

Comments

☐ H. PROFESSIONALISM

ALL STAFF SHOULD STRIVE FOR CONTINUED PROFESSIONAL GROWTH OPPORTUNITIES.

☒ S

The following criteria are guidelines for consideration:  
Serves to attend workshop, seminars, etc. to provide for professional growth.

Demonstrates a willingness to serve in a responsible position in local, district or state educational organizations.

Comments

Teacher's Comments:

(If extra comment area is needed, please attach an additional sheet.)

*Agreement doesn't mean I'm in agreement. I will add an attachment.*

I have read this report and discussed it with my evaluator.

OVERALL EVALUATION:

☐ - Satisfactory

☒ U - Unsatisfactory

*Deleone de Leon*  
Signature of Teacher

*[Signature]*  
Signature of Evaluator



## CRAWFORD CENTRAL SCHOOL DISTRICT

7001 1940 000

EXHIBIT  
93

Instructional Support Center  
11280 Mercer Pike  
Meadville, Pennsylvania 16335-9504  
Telephone: (814) 724-3960  
FAX: (814) 333-8731  
WWW.CRAW.ORG

Michael E. Dolecki, Superintendent

Charles E. Heller III  
Assistant Superintendent  
Shawn G. Sampson  
Business Manager/Board Secretary  
Suzanne L. Good  
Director of Elementary Curriculum  
Jennifer A. Brown  
Director of Secondary Curriculum  
Nicholas J. Chrapovich  
Director of Special Services  
John M. Bauer  
Supervisor of Buildings & Grounds  
Richard L. Fraker  
Coordinator of Technology

### OFFICE OF THE SUPERINTENDENT

April 16, 2003

CERTIFIED MAIL NO. 7001 1940 0007 0045 8495

Ms. Claudette G. deLeon  
11983 Bureka Road  
Edinboro, PA 16412

RE: Suspension Without Pay

Dear Ms. deLeon:

The purpose of this letter is to confirm your suspension without pay effective Monday, April 14, 2003, as communicated to you by the Assistant Superintendent with my authorization at the conclusion of the meeting held on Friday, April 11, 2003, with your Association Representative.

At that meeting, you had occasion to discuss with those in attendance issues that were a carryover from the meeting on April 10, 2003, surrounding missing student assignments, student notebooks, and your failure to properly and timely provide a student with assignments for work. The meeting was also scheduled to follow up in regard to your conduct and behavior in a meeting with the High School and Assistant High School Principal, when they were meeting with you the day before to discuss work performance issues and to follow up on the classroom observation of April 2, 2003.<sup>1</sup> Please keep in mind that the meeting of April 10, 2003, needed to be discontinued due to your conduct where you became verbally and physically aggressive toward the High School Principal.

As a result of ongoing deficiencies, the Administrators met with you on April 11, 2003, to present you with an unsatisfactory evaluation for the 2002-2003 school year.

<sup>1</sup> Please note a meeting to discuss your observation was not held until April 10, 2003, due to your absence on Thursday, April 3, 2003, and the absence of the High School Principal on Wednesday, April 9, 2003.

In light of your continued work deficiencies, ongoing student discipline issues to include but not limited to, student interactions, student assignments, missing assignments, missing notebooks, failure to properly and timely provide a student with an assignment, failing to adhere to the provisions of your corrective action plan, failing to adhere to directives of your supervisor and your most recent interactions with the Administration on April 10, 2003, it was determined that a recommendation should be made for your dismissal from employment.

As such, the Administrative team, after discussing the issues among themselves and after consulting with me on the matter, it was determined that we would proceed with a recommendation for your dismissal from employment for the following reasons:

1. Immorality
2. Willful neglect of duties
3. Persistent negligence in the performance of duties
4. Persistent and willful violation of or failure to comply with school laws of this Commonwealth (including official directives of the District and its administrative members)
5. Incompetency
6. Unsatisfactory work performance as accompanied by two unsatisfactory ratings.

Subsequent to you being informed of the recommendation for your dismissal from employment, you were also advised that you were being suspended without pay until action is taken on this recommendation.

Please keep in mind that the decision to recommend your dismissal from employment was not taken lightly, however, I do have to reflect upon the fact that last school year you were issued an unsatisfactory rating and issued an improvement plan for the 2002-2003 school year. That improvement plan contained many recommendations for suggestions for improvement.

During the first semester of the 2002-2003 school year, you were observed and provided with additional suggestions for improvement. Despite the suggestions and recommendations for improvement, your work performance did not significantly improve and remained at a sustained level. Although we met with you to revise your improvement plan for the balance of the 2002-2003 school year, your work performance during this school year was marred with various work infractions, failure to adhere to directives by your supervisors as well as to adhere to the improvement plan. It even became necessary to suspend you without pay on two occasions for three (3) and five (5) days respectively in November 2002 and March 2003.

At the time you were issued the five (5) days suspension without pay, various deficiencies were brought to your attention. You were cautioned and issued a final warning that should you engage in any like or similar conduct it may result in a recommendation for your dismissal.

In that letter it also explained that upon your return from suspension you were to significantly improve your work performance and maintain it at a sustained and satisfactory level. Despite the caution to improve your work performance in this area, your conduct, actions and behavior have further demonstrated your inability to perform at a satisfactory level. This would also include your inability to adhere to directives of your supervisors, adhere to the requirements of your action plan as well as suggestions for improvements without becoming combative and confrontational.

Accordingly, based on the totality of your conduct, you leave me with no other alternative but to recommend your dismissal from employment. As such, I am recommending to the School Board that you be relieved of your teaching duties at Crawford Central School District.

Please be aware that I will be asking that a statement of charges be issued within the next week to 10 days outlining the reasons for my recommendation for your dismissal from employment and affording you with an opportunity for a hearing before the Board of School Directors. As outlined before, this recommendation shall encompass: immorality, willful neglect of duties, persistent negligence in the performance of duties, persistent and willful violation of or failure to comply with school laws of this Commonwealth (including official directives of the District and its administrative members), incompetency and unsatisfactory work performance as accompanied by two unsatisfactory ratings.

Please keep in mind that pursuant to the statement of charges, you will be afforded an opportunity to have a hearing before the Board of School Directors at which time you can be represented by counsel, present evidence on your behalf and cross examine witnesses.

- Please keep in mind that during the period of your suspension without pay, you are prohibited from coming onto District property without the prior authorization of the Principal or Superintendent's office.

Sincerely,



Michael E. Dolecki  
Superintendent of Schools

MED/d

PC: Charles E. Heller, III, Assistant Superintendent  
George H. Deshner, High School Principal  
John C. Higgins, Assistant High School Principal  
Carl Beard, Esquire  
Ernil Spadafore, Esquire



## CRAWFORD CENTRAL SCHOOL DISTRICT

Instructional Support Center

11280 Mercer Pike

Meadville, Pennsylvania 16335-9504

Telephone: (814) 724-3960

FAX: (814) 333-8731

www.craw.org

Michael E. Osiecki, Superintendent

April 30, 2003

Charles E. Heller III  
Assistant Superintendent  
Shawn G. Sampson  
Business Manager/Board Secretary  
Suzanne L. Good  
Director of Elementary Curriculum  
Jennifer A. Brown  
Director of Secondary Curriculum  
Nicholas J. Chieropovich  
Director of Special Services  
John M. Bauer  
Supervisor of Buildings & Grounds  
Richard L. Fraker  
Coordinator of Technology

**CERTIFIED MAIL NO. 7002 0510 0003 4972 8305**

Claudette G. deLeon  
11983 Eureka Road  
Edinboro, PA 16412

### RE: Notice of Hearing and Statement of Charges

Dear Ms. deLeon:

This letter is to advise you that a hearing will be held before the Crawford Central Board of School directors to determine whether you should be dismissed from your employment with the District as a professional employee. The hearing has been scheduled for Wednesday, May 14, 2003, at 7:00 P.M. in the Board Room of the Administrative Offices at the Instructional Support Center, 11280 Mercer Pike, Meadville, PA 16335-9504.

The charges brought pursuant to Section 1122 of the Public School Code of 1949, as amended, 24 PS §11-1122. You are being charged by the Administration with incompetency, unsatisfactory teaching performance, persistent negligence in the performance of duties, persistent and willful violation of or failure to comply with the school laws of the Commonwealth of Pennsylvania, including official directives of the District and its administrative members, and immorality as contemplated by Article XI of the Public School Code of 1949, as amended, arising out of your commission and/or omission of the following:

1. Unsatisfactory teaching performance/incompetency as evidenced by two consecutive unsatisfactory ratings, i.e. 2001-2002 school year and for the period covering the issuance of your second unsatisfactory rating during the second week of April 2003. In the case of the first unsatisfactory evaluation, this was presented to you on or about May 28, 2002. At the time the evaluation was presented to you, information which led to the issuance of the unsatisfactory evaluation was discussed with you. An Action Plan for improvement for the 2002-2003 school year was developed and presented to you as a result of this unsatisfactory rating.

During the 2002-2003 school year, you were issued a second consecutive unsatisfactory evaluation covering the first and portions of the second semester of the 2002-2003 school year. The unsatisfactory evaluation was presented and discussed with you on April 11, 2003, by the High School Principal, Assistant High School Principal and Assistant Superintendent in the presence of your Association representatives. During the 2002-2003 school year, you were observed several times and provided with suggestions for improvement both formally and informally through meetings, discussions, communications, observations and through a revised Action Plan. Despite various suggestions for improvement, you did not demonstrate significant and sustained improvement in work performance thereby resulting in your second unsatisfactory evaluation.





2. In addition to the issuance of two consecutive unsatisfactory evaluations for unsatisfactory teaching performance and/or incompetency, you also engaged in inappropriate conduct and failed to adhere to directives of your supervisor. As outlined previously in the suspension without pay letter dated April 16, 2003, on April 10, 2003, a meeting was held with you for the purposes of discussing issues surrounding missing student assignments, student notebooks, and your failure to properly and timely provide a student with assignments for make-up work. This meeting was also being held to follow-up relative to a classroom observation of your teaching performance on April 2, 2003. At the time these issues were being discussed with you, you became verbally and physically aggressive toward the high school principal necessitating the discontinuance of the meeting.

It should be noted that the meeting of April 10, 2003, was preceded by a meeting of April 4, 2003, wherein similar issues surrounding missing student work and maintenance of grades was discussed. During this meeting, you made inappropriate statements to the Administrators who were attempting to provide suggestions for improvement in your work performance. Several times during this meeting your Association Representative had to ask you to refrain from your comments after you were instructed by the Principal to refrain from such sarcastic and reactionary conduct. Despite this, you continued with your comments and blaming the Administration for the events occurring in your classroom as opposed to taking responsibility yourself for such actions.

In addition, at the April 11, 2003, meeting, you were informed of other infractions and/or work deficiencies that included, but are not limited, to the following:

- A. Student interactions
- B. Student assignments
- C. Missing assignments
- D. Missing notebooks
- E. Failure to properly and timely provide a student with an assignment
- F. Failing to adhere to the provisions of your Action Plan
- G. Failing to adhere to directives of your Supervisors.
- H. Providing inaccurate information regarding situations with students

It needs to be noted that although the Administration met with you during the course of the 2002-2003 school year to revise your Action Plan for the balance of the 2002-2003 school year, your work performance during the 2002-2003 school year was marred by various work infractions, failure to adhere to directives by your supervisor, as well as to adhere to the Action Plan. As was noted, it even became necessary to suspend you without pay on two occasions for three (3) and five (5) days in both November 2002 and March 2003, respectively.

On November 20, 2002, you were issued a three (3) day suspension for persistent negligence in the performance of duties, willful neglect of duties, and persistent willful violation of or failure to comply with the school laws of the Commonwealth of Pennsylvania and failure to follow official directives from the Administration. This three (3) day suspension without pay was a result of you exercising poor professional judgement in dealing with a matter within your classroom setting. In addition to interrupting the education of the entire class to make a parental contact, you openly discussed the student's behavior and grades on the phone while students were in the classroom. At that time, you were advised that your actions violated the directives of your Action Plan.

Subsequently, on March 17, 2003, you were issued a five (5) day suspension without pay for immorality, willful neglect of duties, persistent negligence in the performance of duties and persistent and willful violation of or failure to comply with the school laws of the Commonwealth of Pennsylvania (including official directives or established policies of the



**Notice of Hearing and Statement Charges**  
**Claudette G. deLeon**

**Page -3-**

District or any of its administrators). At that time, you were advised that you were being suspended for; 1) failure to adequately maintain a log of student discipline and parental contacts as previously directed; 2) breach of student confidentiality to include providing student discipline and other student information to outside parties; 3) inaccurate reporting of student misconduct on student disciplinary referrals; and 4) not properly following through on student discipline issues as previously directed.

At the time you were issued the five (5) day suspension without pay, you were also cautioned and issued a final warning that should you engage in any like or similar conduct it may result in a recommendation for termination of your employment.

In that letter, it was also explained that upon your return from suspension you were to significantly improve your work performance and maintain it at a satisfactory level. Despite the caution to improve your work performance and to refrain from inappropriate conduct/actions/behavior, since the issuance of your revised Action Plan and the five (5) day suspension without pay, your work performance has remained at an unsatisfactory level.

It needs to also be noted that in past years you have also been suspended and reprimanded for other infractions regarding your conduct and behavior within the school setting. Despite clear directives and warnings being issued to you, your interactions with administration and students has not improved.

Accordingly, it is the belief of the Administration that your actions as set forth above evidence incompetency, unsatisfactory teaching performance, intemperance, willful neglect of duties, persistent negligence in the performance of duties, persistent and willful violation of or failure to comply with the school laws of the Commonwealth of Pennsylvania. Your actions are also a violation of the Educators Code of Conduct as outlined in 22 Pa. Code 235.1, et seq. The Administration believes through your actions over the course of the 2001-2002 school year as well as the 2002-2003 school year, you have failed to exercise the level of judgement and direction expected of a professional educator as well as the standard of work performance at the satisfactory level.

Because of the ongoing deficiencies and because you have been previously warned regarding the need to improve your performance and behavior in this regard, the Superintendent has requested a statement of charges be issued recommending that you be dismissed from your employment.

Please keep in mind that additional evidence of the above charges demonstrating unsatisfactory work performance, poor professional judgement, inappropriate conduct and statements, may be presented at the hearing to be considered by the Board of School Directors.

A hearing has been scheduled for Wednesday, May 14, 2003, at 7:00 P.M. At that hearing you will be entitled to the following rights:

1. The right to be represented by counsel;
2. The right to hear the witnesses and evidence against you and to cross examine said witnesses;
3. The right to present witnesses and evidence on your own behalf and to testify on your own behalf;
4. The right to present evidence as to whether discharge or some other lesser personnel action is appropriate under the circumstances;
5. The right to have your choice of either a public or private hearing;
6. All other rights guaranteed to you by the Constitution and applicable law.

**Notice of Hearing and Statement Charges**  
**Claudette G. deLeon**

**Page -4.**

If you have any questions, feel free to contact or have your attorney contact Carl P. Beard, Esquire, who will be representing the Administration in the prosecution of this case. Mr. Beard's telephone number and mailing address are as follows:

Carl P. Beard, Esquire	Phone: 814-943-7962
Andrews Wagner & Beard	
3366 Lynwood Drive	FAX: 814-943-3430
P.O. Box 1311	
Altoona, PA 16603-1311	

Pursuant to the express terms of your professional employee contract and Section 1121 of the Public School Code, 24 P.S. 11-1121, your right to a hearing describe herein is conditioned upon your written request for the hearing within ten (10) days after your receipt of this notice. If you desire a hearing, your written request for a hearing must be delivered to the Board Secretary's Office located at the Administrative Offices at the Instructional Support Center, 11280 Mercer Pike, Meadville, PA 16335-9504.

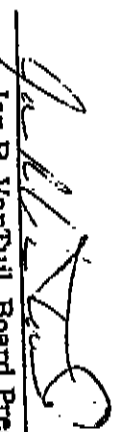
**Your failure to request a hearing will constitute a waiver of your statutory and constitutional rights and you will be discharged from employment without any hearing. IF YOU CONTEST YOUR DISMISSAL, YOU MUST ASK FOR A HEARING OR YOU WILL LOOSE ALL OF YOUR RIGHTS and the hearing described above will be cancelled.**

In lieu of a School Board hearing, you would be able to pursue this dismissal action against you through grievance arbitration as outlined in the collective bargaining agreement.

Attest:

CRAWFORD CENTRAL SCHOOL DISTRICT  
BOARD OF SCHOOL DIRECTORS

  
Shawn G. Sampson, Board Secretary

  
Jan R. Vantul, Board President

PC: Michael E. Dolecki, Superintendent of Schools  
Carl P. Beard, Esquire  
Dan W. Hootman, C.C.E.A. President  
Personnel File

**Affidavit**


**Roberta Binder Heath, Esquire**



I, Roberta Binder Heath, do hereby solemnly attest and affirm that my review of the PHRC file for Claudette deLeon, provided pursuant to a subpoena, did not include any April 30, 2003 termination letter or directive to amend the PHRC Complaint to include termination.

  
Roberta Binder Heath, Esquire

Sworn to and subscribed before me  
this 23<sup>rd</sup> day of June, 2006.

  
Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Kathryn A. Milward, Notary Public  
City Of Allentown, Berks County  
My Commission Expires Feb. 4, 2010

Member, Pennsylvania Association of Notaries